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Attorneys for Defendant,
CAPITAL ONE BANK (USA), N.A.,
Named as "Capital One, N.A."

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

ELEANOR MUNROE, an individual,

Plaintiff,

v.

CAPITAL ONE, N.A.; EARLY
WARNING SERVICES, LLC; JP
MORGAN CHASE BANK, N.A.; AND
LEXISNEXIS RISK SOLUTIONS, INC.

Defendants.

Case No. 2:20-cv-00707-GMN-DJA

*Assigned to Chief Judge Gloria A.
Navarro;
Referred to Magistrate Daniel J.
Albregts*

**STIPULATION AND
[PROPOSED] ORDER TO
EXTEND TIME TO RESPOND
TO COMPLAINT**

(FIRST REQUEST)

Complaint Filed: April 21, 2020

1 Plaintiff Eleanor Munroe ("Plaintiff"), by and through her counsel of record,
2 and Defendant Capital One Bank (USA), N.A., named as "Capital One, N.A."
3 ("Capital One"), by and through its counsel of record (collectively, the "Parties"),
4 hereby submit this stipulation to extend Capital One's time to file a responsive
5 pleading to Plaintiff's Complaint by twenty-one (21) days, as follows:

6 **WHEREAS:**

- 7 1. Plaintiff filed the Complaint in this matter on April 21, 2020;
- 8 2. The Parties agree that a brief extension of time for Capital One to file its
9 responsive pleading to the Complaint would benefit both Parties because it will allow
10 them to continue to gather additional facts and information while continuing to devote
11 their resources to exploring the potential for early resolution of this matter before
12 incurring further fees and costs;
- 13 3. The Parties agree this request is made in good faith and not for the
14 purposes of delay;
- 15 4. Capital One and Plaintiff have agreed to extend Capital One's deadline
16 to respond to Plaintiff's Complaint to June 8, 2020.

17 **NOW, THEREFORE, IT IS HEREBY STIPULATED THAT:**

18 Capital One will file its responsive pleading to Plaintiff's Complaint on or
19 before June 8, 2020.

20
21 **IT IS SO STIPULATED.**

22 DATED: May 18, 2020

KNEPPER & CLARK LLC

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25 By: /s/ Miles N. Clark
26 MILES N. CLARK
27 MATTHEW I. KNEPPER
28 Attorneys for Plaintiff,
ELEANOR MUNROE

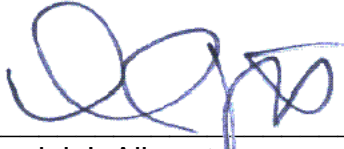
1 DATED: May 18, 2020

FERNALD LAW GROUP LLP

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3 By: /s/ Brandon C. Fernald
4 BRANDON C. FERNALD
5 Attorneys for Defendant,
CAPITAL ONE BANK (USA), N.A.

6 **IT IS SO ORDERED:**

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8 DATED: May 19, 2020


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10 Daniel J. Albregts
11 United States Magistrate Judge
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Attorneys for Defendant
CAPITAL ONE BANK (USA), N.A.,
Named as "Capital One, N.A."

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

11)	Case No. Case No. 2:20-cv-00707-GMN-DJA
12	ELEANOR MUNROE, an individual,)	
13	Plaintiff,)	<i>Assigned to Chief Judge Gloria A. Navarro;</i>
14	v.)	<i>Referred to Magistrate Daniel J. Albregts</i>
15	CAPITAL ONE, N.A.; EARLY)	
16	WARNING SERVICES, LLC; JP)	
17	MORGAN CHASE BANK, N.A.; AND)	
18	LEXISNEXIS RISK SOLUTIONS, INC)	
	Defendants.)	
	_____)	

CERTIFICATE OF SERVICE

CERTIFICATE OF SERVICE

I, Brandon C. Fernald, declare that I am over the age of eighteen years and not a party to this action. I am employed in Clark County, and my business address is: Fernald Law Group LLP, 6236 Laredo Street, Las Vegas, Nevada 89146.

On May 18, 2020, I hereby certify that a true and complete copy of the foregoing documents:


1. STIPULATION AND [PROPOSED] ORDER TO EXTEND TIME TO RESPOND TO COMPLAINT (FIRST REQUEST)

have been served by forwarding said copy on this the 18th day of May 2020 by transmitting via the Court's ECF system the documents listed above to:

Matthew I. Knepper Miles N. Clark Knepper & Clark LLC 5510 So. Fort Apache Rd., Ste. 30 Las Vegas, NV 89148 Tel: (702) 856-7430 Fax: (702) 447-8048 Email: matthew.knepper@knepperclark.com miles.clark@knepperclark.com <i>Attorneys for Plaintiff</i> Eleanor Munroe	David H. Krieger Krieger Law Group, LLC 2850 W. Horizon Ridge Blvd., Ste. 200 Henderson, NV 89052 Tel: (702) 848-3855 Email: dkrieger@kriegerlawgroup.com <i>Attorneys for Plaintiff</i> Eleanor Munroe
Gary E. Schnitzer Kravitz, Schnitzer & Johnson, Chtd. 8985 S. Eastern Ave., S.te 200 Las Vegas, NV 89123 Tel: (702) 222-4142 Fax: (702) 362-2203 Email: gschnitzer@ksjattorneys.com <i>Attorneys for Defendant</i> LexisNexis Risk Solutions, Inc.	Meagan Mihalko Troutman Sanders 1001 Haxall Point Ste 1500 Richmond, VA 23219 Tel: (804) 697-1281 <i>Attorneys for Defendant</i> Early Warning Services, LLC (SERVICE BY FIRST CLASS USPS)

I declare under penalty of perjury under the laws of the State of Nevada that the foregoing is true and correct.

DATED: May 18, 2020



Brandon C. Fernald